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13 LYFT, INC.

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**

17 MICHAEL NOKCHAN, on behalf of himself
18 and all others similarly situated,

19 Plaintiff,

20 v.

21 LYFT, INC.,

22 Defendant.

Case No. 3:15-cv-03008-JCS

**DECLARATION OF DANIEL JONES
IN SUPPORT OF LYFT, INC.'S
NOTICE OF MOTION AND MOTION
TO DISMISS OR STAY ACTION**

Date: Friday, October 2, 2015
Time: 9:30 a.m.
Courtroom: G, 15th Floor

Honorable Joseph C. Spero

[Notice of Motion and Motion to Dismiss or
Stay Action, Memorandum of Points and
Authorities In Support Thereof, and
[Proposed] Order Filed Concurrently
Herewith]

I, Daniel Jones, hereby declare as follows:

1. I am an attorney at the law firm of Mayer Brown LLP and am one of the counsel for Defendant Lyft, Inc. (“Lyft”) in this action. I make this declaration in support of Lyft’s Motion to Dismiss or Stay Action. I have personal knowledge of the matters set forth herein, and could and would competently testify thereto if called as a witness.

2. Attached hereto as Exhibit A is a true and correct copy of Docket Number 119, the Court’s Order Staying *Miller v. Trans Union LLC*, No. 12-cv-1715 (M.D. Pa. Aug. 3, 2015).

3. Attached hereto as Exhibit B is a true and correct copy of Docket Number 31, the Court’s Order Staying *Provo v. Rady Children’s Hosp.*, No. 15-cv-81 (S.D. Cal. July 29, 2015).

4. Attached hereto as Exhibit C is a true and correct copy of Docket Number 45, the Court’s Order Staying *Flores v. Collection Consultants of Cal.*, No. 14-cv-771 (C.D. Cal. July 27, 2015).

5. Attached hereto as Exhibit D is a true and correct copy of Docket Number 59, the Court’s Order Staying *Kirchner v. Shred-It USA, Inc.*, No. 14-cv-1437 (E.D. Cal. June 18, 2015).

6. Attached hereto as Exhibit E is a true and correct copy of Docket Number 462, the Court’s Order Staying *In re Monitronics Int’l, Inc. Telephone Consumer Protection Act Litig.*, No. 1:13-md-2493 (N.D. W.Va. June 17, 2015).

I declare under penalty of perjury under the laws of the State of California and of the United States of America that the foregoing is true and correct.

Executed on the 26th day of August, 2015, at Washington, D.C.

/s/ Daniel Jones
Daniel Jones

FILER'S ATTESTATION

Pursuant to Local Rule 5-1(i), I, John P. Zaimes, attest that I obtained concurrence in the filing of this document from Daniel Jones.

Dated: August 26, 2015

MAYER BROWN LLP

By: /s/ John P. Zaimes
John P. Zaimes

Attorneys for Defendant,
LYFT, INC.